

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>DANE JAMES, an individual,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>08CV4042</b>
	)	
<b>v.</b>	)	<b>Judge Norgle</b>
	)	
<b>SARAH KRUPP, an individual, and</b>	)	<b>Mag. Judge Keys</b>
<b>TECHNOLOGY CONTROLS GROUP, INC.,</b>	)	
<b>a Tennessee corporation,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF’S MOTION FOR LEAVE TO CONDUCT  
DISCOVERY AS TO THE WHEREABOUTS OF DEFENDANT**

Plaintiff, Dane James (“James”), by and through his attorneys, Daniel S. Kaplan and Marcia G. Cotler of Kaplan & Greenswag LLC, hereby brings this Motion to Conduct Discovery on the whereabouts of Defendant Sarah Krupp (“Krupp”), and in support thereof states as follows:

1. On July 16, 2008, James filed a lawsuit claiming that Krupp duped him into wiring \$150,000 to invest in Defendant, Technology Controls Group, Inc., a company owned by Krupp.
2. After James wired the funds per the instructions of Krupp, the \$150,000 went missing, along with Krupp.
3. James hired a process server to attempt to serve the Summons and Complaint upon Krupp in the State of Tennessee at her last known address. James has been informed, however that Krupp has moved without a forwarding address and the process server has been unsuccessful in otherwise locating Krupp.

4. Service was also attempted upon Defendant Technology Controls Group, Inc. by way of service upon its registered agent, but the registered agent could not be served.

5. Plaintiff is currently taking measures to serve Defendant Technology Controls Group, Ind. by way of service upon the Secretary of State of Tennessee.

6. It is believed that Krupp is intentionally dodging service of process.

7. James is aware of the identity and addresses of several individuals who are believed to have information as to Krupp's whereabouts. James seeks this Court's permission, for the limited purpose of issuing subpoenas to those individuals, in an attempt to determine Krupp's whereabouts and to thereby serve Krupp.

8. Defendants would not be prejudiced by allowing Plaintiff to serve discovery limited to ascertaining the whereabouts of Krupp.

WHEREFORE, Dane James respectfully requests that this Court grant his Motion for Leave to Conduct Discovery as to the Whereabouts of Defendant Sarah Krupp.

RESPECTFULLY SUBMITTED,

DANE JAMES

By: s/ Daniel S. Kaplan  
One of his attorneys

Daniel S. Kaplan (ARDC # 6204533)  
Marcia G. Cotler (ARDC # 6201178)  
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